

REMARKS

Claims 1-19 are pending in the application. The specification is amended to correct a typographical error. Claim 9 is amended to correct a typographical error. Claims 17-19 are added. The amendments do not add new matter, and entry at this time is proper.

Favorable reconsideration and allowance of the present patent application are respectfully requested. This amendment, in conjunction with the following remarks is believed to place the application in immediate condition for allowance. Accordingly, entry of the amendment and favorable consideration of the application is respectfully requested in view of the foregoing amendments and the following remarks.

Though claim 9 is amended, Applicants do not concede that the Office Action's statutory rejection is proper. The amendments are understood to not narrow the scope of the claimed embodiments, nor are they made for reasons related to patentability. Rather, the amendments are made to correct typographical errors. Thus, in future construction and interpretation, the amended claims should be entitled to a full range of equivalents.

Applicants acknowledge with appreciation that the Examiner indicates that the Information Disclosure Statement filed May 26, 2000, has been considered. Applicants also note that acknowledgement has been made for the claim for foreign priority under 35 U.S.C. § 119.

35 U.S.C. § 102 and 103 Rejections

Claims 1-2, 7, 9-10 and 15 stand rejected under 35 U.S.C. § 102(b) as allegedly anticipated by Applicants' background (the Background). Claims 3-6, 8, 11-14 and 16 stand rejected under 35 U.S.C. § 103(a) as allegedly rendered obvious by the Background. Applicants respectfully traverse the rejections in view of the foregoing amendments and the following remarks.

Anticipation

To anticipate, a reference must disclose each and every element of the claimed invention. Applicants maintain that the Background does not disclose each and every element of independent claims 1 and 9. Specifically, the Background does not disclose a macro event data creation unit which creates macro event data by structurizing a plurality of event data generated by the event data creation unit based on definition contents of the macro event defined by the macro event definition unit.

The Office Action alleges that a macro event definition unit and a macro event data creation unit is shown by Fig. 32 of Applicants' disclosure. Applicants respectfully disagree. Fig. 32 shows a relationship between related events, an event image and a macro event image, such as the relationship between macro event images 141 and 142 and events 121-125, for illustrative purposes. Figs. 28-32 do not describe any manner to create macro event data by structurizing a plurality of event data generated by an event data creation unit based on

definition contents of the macro event defined. Further, a macro event data creation unit, as recited in claim 1, is not shown in Figs. 28-32.

The present invention discloses a solution to the problems of the cited conventional image collection apparatus. These problems are caused by the conventional image collection apparatus storing an event image of an image captured for a predetermined time around a time point at which an event is generated. In the conventional image collection apparatus, each event image is stored independently of other event images. As a result, it is difficult to determine the chronological relationship among a group of events. Thus, time and labor are required to retrieve the group of events, as described with reference to Figs. 30-32.

In contrast, the present invention, according to independent claims 1 and 9, discloses a macro event definition unit which defines a macro event including a related event group and having a time width by using the generation time and contents of the event, and a macro event data creation unit which creates macro event data by structurizing a plurality of event data generated by the event defined by the macro event definition unit. Referring to Fig. 32 of the Background, the macro event definition unit, the macro event data generation unit, and the retrieval unit are not disclosed.

Thus, for at least these reasons, claims 1-2, 7, 9-10 and 15 are not anticipated. Applicants respectfully request that the Examiner withdraw the anticipation rejections.

Obviousness

Claims 3-6, 8, 11-14 and 16 are allegedly rendered obvious by the Background. Claims 3-6, 8, 11-14 and 16 are dependent claims that depend from independent claims 1 and 9. If an independent claim is not obvious, then any claim depending from the independent claim is not obvious MPEP 2143.03. Thus, Applicants respectfully requests that the Examiner withdraw the obviousness rejections.

New Claims

New claims 17-19 are submitted that define alternative embodiments of the present invention. New claims 17-19 also distinguish over the Background for the reasons given above, and are, therefore, allowable.

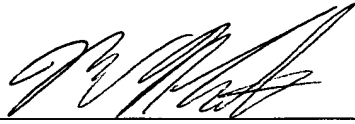
CONCLUSION

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact William F. Nixon (Reg. No. 44,262) at the telephone number of the undersigned below, to conduct an interview in an effort to expedite prosecution in connection with the present application.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

Respectfully submitted,

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2611-0128P